

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ERNEST N. FINLEY, JR.)	
)	
Plaintiff,)	CIVIL ACTION NUMBER
)	2:23-CV-00146-KKD-PBM
v.)	
)	
CITY OF MONTGOMERY, et al.,)	
)	
Defendants.)	

MOTION TO STAY

COMES NOW Plaintiff Ernest N. Finley, Jr., and moves the court for a temporary stay of proceedings.

Counsel for Plaintiff has filed a motion to withdraw pursuant to the Rule 1.16 (a)(2) of the Alabama Rules of Professional Conduct.

Plaintiff seeks a temporary stay of proceedings for remaining counsel to become familiar with the status of litigation and make an informed decision as to whether additional counsel will be engaged to enter an appearance in this matter.

Wherefore Plaintiff seeks a temporary stay of proceedings to seek alternate counsel pursuant to her current counsel's inability to continue representation pursuant to Rule 1.16 (a)(2) of the Alabama Rules of Professional Conduct.

Respectfully submitted,

/s/ Alicia K. Haynes
Alicia K. Haynes

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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